

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Case No. 1:16CV1070 (RDA/IDD)
MATTHEW BISSONNETTE,	)	
	)	
Defendant.	)	
_____	)	

**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT’S  
MOTION TO VACATE CONSENT DECREE AND ENTER SUMMARY JUDGMENT IN  
FAVOR OF DEFENDANT**

Plaintiff United States of America, with the consent of Defendant Matthew Bissonnette, respectfully moves the Court for a fourteen (14) day enlargement of time in which to respond to Plaintiff’s Motion to Vacate Consent Decree and Enter Summary Judgment in Favor of Defendant (“Motion”). Dkt. No. 5; *see* Fed. R. Civ. P. 6(b). The United States asserts that there is good cause for this request, as follows:

1. On August 19, 2020, Defendant Matthew Bissonnette filed a Motion pursuant to Federal Rule of Civil Procedure 60(b), seeking to vacate a Consent Decree that was entered in this action on August 15, 2016. *See* Motion, Dkt. No. 5. Defendant further moved the Court to enter summary judgment in his favor pursuant to Federal Rule of Civil Procedure 56(b), presumably if the Consent Decree is vacated. *Id.*
2. The Consent Decree at issue was entered after the United States filed a Complaint alleging that Defendant, a former senior non-commissioned officer in the U.S. Navy, breached his contractual and fiduciary obligations by publishing a book without submitting the manuscript for prepublication review and giving presentations using

materials that were not cleared for public release, in violation of his non-disclosure agreements and obligations to the United States. Dkt. No. 1.

3. Prior to Defendant's filing of the Motion, this civil action had been closed for nearly four years. Both the Assistant United States Attorney and the Department of Justice trial attorney who litigated this action before this Court have since left the government.
4. Pursuant to Local Civil Rule 7(F), the United States' response to the Motion would ordinarily be due within fourteen (14) days, or by September 2, 2020.
5. In order to allow the United States' counsel an opportunity to become more familiar with this matter and respond fully to Defendant's requests to vacate the Consent Order and for summary judgment in his favor, while meeting competing deadlines in other cases, the United States respectfully requests an extension of fourteen (14) days – or until September 16, 2020 – to respond to the Motion.
6. The requested extension will not affect the hearing date on October 14, 2020.
7. Defendant's counsel has advised that Defendant consents to the requested extension.

Dated: August 27, 2020

Respectfully submitted,

G. ZACHARY TERWILLIGER  
UNITED STATES ATTORNEY

ETHAN P. DAVIS  
Acting Assistant Attorney General

ANTHONY J. COPPOLINO  
Deputy Director, Federal Programs Branch

                    /s/                      
LAUREN A. WETZLER  
Chief, Civil Division

Assistant United States Attorney  
Justin W. Williams U.S. Attorney's Building  
2100 Jamieson Avenue  
Alexandria, Virginia 22314  
Tel: (703) 299-3752  
Fax: (703) 299-3983  
Email: [lauren.wetzler@usdoj.gov](mailto:lauren.wetzler@usdoj.gov)

KEVIN M. SNELL  
Trial Attorney  
United States Department of Justice  
Civil Division, Federal Programs Branch  
1100 L St. NW  
Washington, DC 20005  
Tel: (202) 305-0924  
Fax: (202) 616-8460  
Email: Kevin.Snell@usdoj.gov

*Counsel for Plaintiff United States of America*